

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Cambridge Electric Section 34A)
Tariff Filing)
_____)

DTE 03 – 58

PETITION TO INTERVENE
ON BEHALF OF THE
CITY OF CAMBRIDGE

The City of Cambridge hereby petitions for leave to intervene and participate in the above-captioned proceeding pursuant to 220 CMR s 1.03, and G.L. c164 s 34A(d). In support of its request, the petitioner states the following:

- 1) Petitioner's name and address are as follows:

City of Cambridge, Massachusetts
795 Massachusetts Ave.
Cambridge, MA 02139 – 3201

- 2) The Petitioner is substantially and specifically and uniquely affected by the above captioned proceeding, in that the Petitioner is the only entity legally able to take streetlight service at the streetlight tariff to be established in the above captioned proceeding. The Petitioner has already filed the conversion notice, required by GL c 164 s 34A, signaling the Petitioner's intent to convert its streetlighting service to the Section 34A tariff to be established in the above captioned proceeding.
- 3) The contention of the Petitioner is that the Section 34A distribution tariff to be established in the above captioned proceeding should be limited to "an alternative tariff . . . providing for delivery service by the electric company of electric energy . . . over distribution facilities and wires owned by the electric company to lighting equipment owned . . . by the municipality, and further providing for use by such municipality of the space on any pole, lamp post, or other mounting surface previously used by the electric company for the mounting of the lighting equipment of the electric company."
- 4) The Petitioner will submit evidence from other Section 34A tariff proceedings regarding the costs appropriately included and, or recovered in the Section 34A

tariff approved in other proceedings, as well as the financial impact on the Petitioner associated with the inclusion of cost and services in the Section 34A tariff in this proceeding, which were excluded from the Section 34A tariff in other proceedings.

- 5) The Petitioner requests the right to participate in all aspects of this proceeding, including, as it deems necessary, the presentation of testimony, the cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

John Shortsleeve, Esq.
Attorney for the City of Cambridge
70 Bailey Blvd.,
Haverhill, MA 01830
978 352 9099
978 352 9669 (Fax)
Baystateconsultants@attbi.com